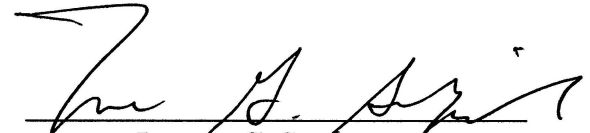Application **GRANTED** as to the redactions proposed by Plaintiff at Dkt. 177-1 and otherwise **DENIED**. By **December 3, 2024**, Defendant shall file unredacted Exhibits 2, 3 and 4 and redacted Exhibit 5 on the public docket.

Michael A. Paskin
mpaskin@cravath.com
T+1-212-474-1760
New York

Dated: November 25, 2024
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

November 20, 2024

Loomis Sayles Trust Company, LLC v. Citigroup Global Markets Inc., No. 1:22-cv-6706-LGS

Dear Judge Schofield:

Pursuant to Rule I.D.3 of Your Honor's Individual Rules and Procedures for Civil Cases and the Stipulated Protective Order for Confidential Information (Dkt. No. 40), Defendant Citigroup Global Markets Inc. ("CGMI") respectfully requests leave to file under seal certain documents in connection with its opposition to Plaintiff Loomis Sayles Trust Company, LLC's ("LSTC") motion for class certification. In particular, for the reasons set forth herein, CGMI seeks to file under seal unredacted versions of excerpts of four deposition transcripts (Exhibits 2, 3, 4, 5).

LSTC has designated the above-referenced deposition transcripts as "Confidential" or "Confidential – Attorneys Eyes Only" pursuant to the Protective Order entered in this matter on November 21, 2022 (Dkt. No. 40). Consistent with Your Honor's Individual Rule I.D.3 and the Protective Order in this case, unredacted copies of these documents have been filed under seal.

CGMI takes no position as to whether the information at issue qualifies for sealing by this Court, but has filed it under seal based on the designations by LSTC.

Respectfully submitted,

/s/ Michael A. Paskin

Michael A. Paskin

The Honorable Lorna G. Schofield
    U.S. District Court for the Southern District of New
        Thurgood Marshall United States Courthouse
            40 Foley Square
                New York, NY 10007

VIA ECF

NEW YORK
Two Manhattan West
375 Ninth Avenue
New York, NY 10001
T+1-212-474-1000
F+1-212-474-3700

LONDON
CityPoint
One Ropemaker Street
London EC2Y 9HR
T+44-20-7453-1000
F+44-20-7860-1150

WASHINGTON, D.C.
1601 K Street NW
Washington, D.C. 20006-1682
T+1-202-869-7700
F+1-202-869-7600

CRAVATH, SWAINE & MOORE LLP

Copies to:

FOLEY HOAG LLP
Matthew C. Baltay (*pro hac vice*)
Dean Richlin (*pro hac vice*)
Kenneth S. Leonetti
Leah S. Rizkallah
Amanda S. Coleman
Natalie f. Panariello (*pro hac vice*)

VIA ECF